



PREFERRED NETWORKS, INC.

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July 1, 1992

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Federal Communications Commission
Office of the Secretary

FCC MAIL BRANCH

Donna M. Searcy, Secretary
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

**ORIGINAL
FILE**

Dear Ms. Searcy:

Re: RM-7986

This letter is in response to NABER's proposal to grant exclusive use of the 929 MHz private carrier paging frequencies. I realize our comments are outside of the time limit for responding on this matter; however, I encourage the Commission to consider our views in your decision-making process.

Preferred Networks, Inc. (PNI) does not support the exclusive use of 929 MHz PCP frequencies without the same rights and benefits given to the both the 150-MHz and 450-MHz PCP frequencies. PNI is a private carrier network provider licensed on 157.740 MHz in Georgia. We are currently operating a large network in the Greater Atlanta/Northeast Georgia market and have plans to expand our business throughout the Southeast. As an operator on 157.740 MHz, we are obligated to share this channel with existing licensees, not only to operate our existing system, but to negotiate our expansion into other markets. To grant exclusive use of the 929 MHz PCP channel will cause the existing operators on the 150-MHz and 450-MHz channels to deal with increased crowding and co-license operational issues. These issues are very time consuming and expensive to handle.

My personal experience in paging causes me concern that any ruling in favor of such exclusivity will force three adverse reactions within the paging industry:

1. Channel "hoarding" as has occurred with existing RCC channels' licensees;
2. Unfair operating advantages to "exclusive" PCP operators which will restrict the flexibility of other PCP operators who may need 900-Mhz channels for expansion; and
3. Possible state intervention/regulation of "exclusive" PCP channels based upon the restricted rights, similar to those of an RCC.

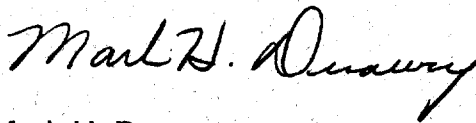
Donna M. Searcy
July 1, 1992
Page 2

PNI urges the Commission to vote against NABER's proposal which we construe will benefit a couple of companies and will seriously disadvantage the vast number of PCP operators on other frequencies.

Should you or any members of the Commission wish to discuss this issue with me in more depth, please feel free to contact me. My private number is 404/350-0825.

As a courtesy, we are forwarding a copy of this letter to other commentators in this proceeding.

Very truly yours,

A handwritten signature in cursive script, reading "Mark H. Dunaway".

Mark H. Dunaway
Chairman & CEO

copy: PNI Board of Directors
Commentators (See List Attached)

Certificate of Service

I, Mary Ann Haskins, Corporate Secretary for Preferred Networks, Inc. hereby certify that I have on this 2nd day of July 1992, sent via First Class U.S. Mail a copy of the letter from Mark H. Dunaway/Preferred Networks, Inc. to Donna M. Searcy/Federal Communications Commission dated July 1, 1992, to the following:

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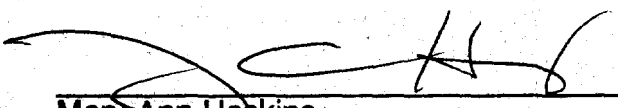
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